

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 7
)	Case No. 09-50026 (REG)
General Motors Corp., <i>et al</i> ,)	(Jointly Administered)
)	
Debtors.)	

**NOTICE OF APPEARANCE
AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned hereby enters his appearance in this case as counsel to ATS Automation Tooling Systems, Inc. in the above-captioned bankruptcy cases.

FURTHER, PLEASE TAKE NOTICE that, pursuant to Rules 2002(i) and 9007 of the Federal Rules of Bankruptcy Procedure, the undersigned request that all notices and all other papers required to be served in this case be served upon the following person and that the following person be added to the mailing matrix in this case:

Robert D. Gordon
Clark Hill PLC
151 South Old Woodward Avenue
Suite 200
Birmingham, Michigan 48009
Telephone: (313) 965-8572
Facsimile: (313) 309-6872
rgordon@clarkhill.com

FURTHER, PLEASE TAKE NOTICE that, without limiting the foregoing request for service of all notices and other papers, the undersigned specifically request, pursuant to Rule 3017(a) of the Federal Rules of Bankruptcy Procedure, to be served with all proposed plans of reorganization and disclosure statements and objections relating thereto, as well as all other pleadings, memoranda, and briefs in support of any of the foregoing.

Neither this Notice of Appearance, nor any subsequent appearance, pleading, claim or suit, is intended to waive: (a) ATS Automation Tooling Systems, Inc.'s right to have final orders in non-core matters entered only after *de novo* review by a federal district court judge; (b) ATS Automation Tooling Systems, Inc.'s right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (c) ATS Automation Tooling Systems, Inc.'s right to have the reference withdrawn by the federal district court in any matter subject to mandatory or discretionary withdrawal; (d) any other rights, claims, actions, or defenses to which

ATS Automation Tooling Systems, Inc. is or may be entitled in law or in equity, all of which rights, claims, actions, and defenses are expressly reserved.

CLARK HILL PLC

/s/ Robert D. Gordon 

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Dated: June 10, 2009

Counsel to ATS Automation Tooling Systems, Inc.